RECLAMATION
Managing Water in the West

DRAFT FINDING OF NO SIGNIFICANT IMPACT

Long-term Annual Exchanges of up to 4,000 acre-feet of Water per year between Paramount Citrus Association and its Related Companies and the Tulare Irrigation District

FONSI-08-41

Recommended by:

_____ Date: _____
Ned Gruenhagen
Wildlife Biologist
South-Central California Area Office

Concurred by:

_____ Date: _____
Chuck Siek
Supervisory Natural Resources Specialist
South-Central California Area Office

Concurred by:

_____ Date: _____
Valerie Curley
Acting Chief, Resources Management Division
South-Central California Area Office

Approved by:

_____ Date: _____
Laura Myers
Deputy Area Manager
South-Central California Area Office

DRAFT FINDING OF NO SIGNIFICANT IMPACT
Long-term Annual Exchanges of up to 4,000 acre-feet of Water per year between Paramount Citrus Association and its Related Companies and the Tulare Irrigation District

In accordance with the National Environment Policy Act of 1969, as amended, the South-Central California Area Office of the U.S. Bureau of Reclamation (Reclamation) has determined that Reclamation's Proposed Action of permitting annual exchanges from 2010 through water contract year 2026 (i.e. through February 28, 2027), of up to 4000 acre-feet of Tulare Irrigation District's (TID) Central Valley Project (CVP) water allocation under Friant Division long-term water service contract number 175-2485-LTR1, for an equal amount of Paramount Citrus Association's (PCA's) non-CVP water derived from its ownership of Rayo Ranch, is not a major federal action that would significantly affect the quality of the human environment and an environmental impact statement is not required. This Finding of No Significant Impact (FONSI) is supported by Reclamation's Environmental Assessment (EA) Number 08-41, 10-22, *Long-term Annual Exchanges of up to 4,000 acre-feet per year between Paramount Citrus Association and Tulare Irrigation District*, dated June 2010, and is hereby incorporated by reference.

Background

The San Joaquin Valley in California has historically experienced periods of drought and flooding. Water agencies strive to prepare for varying water supply conditions to the extent possible so that agricultural or urban water supply needs can be met regardless of the type of water year. Paramount Citrus Association (PCA) and Paramount Farming Company (PFC, a related entity) have historically transferred and exchanged water among their companies and moved water to its highest use on the farming operations throughout the San Joaquin Valley. These exchanges have typically occurred to allow water delivery on common landholdings in Cawelo Water District (CWD), Kern-Tulare Water District (KTWD), Madera Irrigation District (MID), North Kern Water Storage District (NKWSD), Shafter-Wasco Irrigation District (SWID), and Southern San Joaquin Municipal Utility District (SSJMUD), which are collectively referred to as "Receiving/Exchanging Agencies."

PCA is owner of Rayo Ranch and through Rayo Ranch's interest in Wutchumna Water Company (Wutchumna), PCA is entitled to 9,000 acre-feet (af) of Kaweah River water in most years (The Rayo Ranch is a stockholder in Wutchumna). Beginning in the late 1980s, PCA converted from a flood irrigation system to a micro-sprinkler irrigation system on the Rayo Ranch and was able to decrease yearly water use from approximately 9,000 af to 5,000-6,000 af. The excess has since been delivered to other PCA property or to property of PFC to irrigate established crops. PCA and/or PFC have irrigable acres in each of the Receiving/Exchanging Agencies and while groundwater is available and has been used to supply these lands with irrigation water supplies in past years, pumping costs and the water quality make the groundwater less desirable than importing the Rayo Ranch water.

PCA and PFC need to cost effectively and efficiently supplement the water supplies on their landholdings within the Receiving/Exchanging Agencies' and prevent the use of more expensive and poorer quality groundwater on their lands in dry years while augmenting the groundwater aquifer in wet years to provide future supplies for conjunctive use.

Reclamation proposes to approve annual exchanges of up to 4,000 af/yr of TID's CVP Water allocated under Friant Division long-term water service contract number 175-2485-LTR1 (Contract) for an equal amount of PCA's Rayo Ranch non-CVP water deriving from pre-1914 water rights on the Kaweah River. TID would use the non-CVP water within its Contract service area boundary in compliance with the Reclamation Reform Act and compliance with the Friant Biological Opinion while the exchanged CVP Water would be used on PCA or PFC's agricultural lands situated within the Receiving Agencies' service area boundaries for irrigation purposes during Contract Years 2010 through 2026 (through February 28, 2027) but without any Reclamation Reform Act (RRA) restrictions. Approval would provide for up to a 5% operational difference accruing only to TID and the exchange completed within 3 contract water years (i.e. March 1 through the end of February in the following year).

FINDINGS

Water Resources

Water resources in the Receiving/Exchanging entities would not change. The Rayo water involved in this exchange would be diverted from the Kaweah River to TID through existing facilities consisting of the Wutchumna distribution system and the TID Main Canal. It would then be delivered through TID's distribution system for irrigation of crops in TID. The CVP water received by the Receiving Agencies would be diverted from the San Joaquin River at Friant Dam under Reclamation's normal operations, conveyed through the Friant-Kern Canal (FKC) and/or the Madera Canal, and delivered via the existing distribution facilities of the Receiving Agencies for irrigation of PCA and/or PFC crops within the Friant Division permitted place of use.

Only existing facilities would be used to deliver exchanged water. For every af of PCA's Rayo water delivered to TID, one af of TID's CVP water would be delivered to one or a combination of the Receiving Agencies. TID's CVP water would be released from the FKC into each of the Receiving Agencies existing facilities. The proposed exchange is expected to match the Wutchumna deliveries to TID with the CVP deliveries to the Receiving Agencies on a "bucket for bucket" basis, although operationally, the actual amounts delivered may differ slightly. The Proposed Action anticipates that if an imbalance were to occur, TID would receive more non-CVP water than the quantity of CVP water delivered to the Receiving Agencies. Up to a 5 percent imbalance of Non-CVP water received by TID annually as an operational contingency would be within the scope of the Proposed Action. Over- deliveries would be considered operation losses, however, this amount is small compared with TID's supplies and would not contribute significantly to changes in water resources for TID or for PCA and PFC.

Each exchange transaction would have up to three calendar years to balance. For example, once the first block of CVP Water is delivered to a Receiving Agency, the corresponding block of non-CVP water must be returned to TID in full no later than three-years from the date of CVP water movement. This situation would only temporarily affect water supplies in a Receiving Agency area if water was not immediately exchanged. Given the amount and distribution of supplies among lands, the impact of this process would result in only short term differences in water budgets, which would be insignificant over the areas water resources are being exchanged and applied.

Land Use

Under the Proposed Action there would not be any land conversions, and no land fallowing or habitat restoration would be deferred as a result of this exchange. No lands would be annexed into any service area to specifically use the exchanged water. The Donor Entity (PCA's Rayo Ranch) is exclusively citrus. The Receiving/Exchanging Agencies are dominated by orchards. The Facilitating Agency (TID) is predominantly agricultural. Based on historic patterns of water exchange and agricultural economics, land use and cropping patterns are unlikely to change within any of the agencies as a result of the proposed exchange because the Proposed Action simply represents the optimization of the use of water and the Proposed Action is not expected to have an impact on land use.

Biological Resources

No native, untilled, or similar habitats would be disturbed. The Proposed Action would result in exchange and delivery of water in existing facilities to established agricultural lands for existing land uses, therefore listed species would not be affected. Areas identified as designated critical habitat would not receive water or be disturbed, and therefore there would be no effect to designated critical habitat from the Proposed Action. No Essential Fish Habitat exists in the authorized Place of Use within the bounds of the Receiving/Exchanging agencies, so the Proposed Action would not affect essential fish habitat. The Proposed Action would not affect migratory birds, or species and habitats protected by federal or state law.

Socioeconomic Resources

The Proposed Action would not affect seasonal labor requirements and agriculture dependent businesses would not be affected. No adverse effects on public health and safety would occur. The Proposed Action represents the optimization of water supplies resulting from implementation of water conservation technologies and reduced use of electrical energy in a state where energy resources are already limited. The Proposed Action is not expected to have a significant impact on socioeconomics resources.

Environmental Justice

The Proposed Action would not cause an economic hardship. Under the Proposed Action there would be sustained agricultural production and there would be no disproportionately high adverse human health or environmental effects on minority and/or low-income populations no harm would occur to minority or disadvantaged populations. The delivery of water at a reasonable price ensures low wage jobs are available. The current conditions would effectively remain similar and no impact would occur from the Proposed Action.

Global Climate Change

The Proposed Action would involve no physical changes to the environment, no construction activities, and therefore, would not directly impact greenhouse gasses (GHG) and global climate change. The exchanged water may require less groundwater pumping in some years thereby slightly reducing CO_2 production, although the change would be miniscule in relation to background GHG production and would therefore not affect global climate change. Global climate change is expected to have some effect on the snow pack of the Sierra Nevada's and the run off regime, but it is not yet clear how hydrologic changes would affect the San Joaquin

Valley and water allocations would be made based on hydrologic conditions and environmental requirements. Since Reclamation operations and allocations are flexible, any changes in hydrologic conditions due to global climate change would be addressed within Reclamation's operation flexibility and therefore surface water resource changes due to climate change would be the same with or without the Proposed Action. Therefore, there would be no significant impact to the Proposed Action.

Indian Trust Assets

The Proposed Action would not affect ITA's. The nearest ITA is Tule River Reservation, which is about 28 miles southeast of the Proposed Action location. Reclamation Indian Trust Assets staff concurred that the Proposed Action would not affect ITA's.

Cultural Resources

The Proposed Action would exchange water through existing facilities and therefore would not be the kind of action that would impact cultural resources. No ground disturbing activities would occur. Reclamation Cultural Resources Staff provided concurrence that the Proposed Action, which is administrative in nature, would not affect Cultural Resources.

Cumulative Impacts

The Proposed Action, when added to other similar existing or proposed actions, does not contribute to significant increases or decreases to environmental conditions. The Proposed Action does not trigger other water service actions and does not contribute to cumulative effects to physical resources when added to other water service actions. The Proposed Action would not interfere with deliveries, operations, or cause substantial adverse changes to the rivers, creeks or conveyance facilities, which are interconnected in the lower San Joaquin Valley and allow for a myriad of transfers, exchanges, contract assignments, and conveyances of water. These water service actions are common and are not precedent setting. The concurrent use of the Friant-Kern Canal would not affect CVP operations or CVP contractor's ability to obtain project deliveries.

The Proposed Action would not have a significant impact on socioeconomics resources. Such resources would remain similar and effects of the Proposed Action would not be cumulatively significant with other actions affecting these resources.

The Proposed Action would require less groundwater pumping in some years, thereby slightly reducing CO_2 production, although the change would be miniscule in relation to background GHG production and would therefore not affect global climate change. Global climate change would be the same with or without the Proposed Action and therefore the Proposed Action would not contribute significantly to global climate change.

The Proposed Action was found to not impact land use, biological resources, environmental justice, Indian Trust Assets, or cultural resources and therefore the Proposed Action would not contribute cumulatively to impacts on these resource areas.